

Exhibit B
(Email, Committee to Trustee, 8/20/20)

Pamela M. Egan

From: Benjamin Ellison <Salishsealegal@outlook.com>
Sent: Thursday, August 20, 2020 12:21 PM
To: mark; Pamela M. Egan
Cc: Jason Edward Wax
Subject: Glga Watt: 2004 exam

 **EXTERNAL**

Mark and Pam

Another issue

The law firms I have spoken to about the Perkins Coie claims are: Williams Kastner, Schroeder Goldmark, Calfee, and AFN Law.

The respective point people I have spoken to at these firms are: Scott Henrie, Thomas Breen, Howard Schwartz, and Angus Ni.

Let me know how you want to include them in your 2004 efforts going forward.

I think each firm is interested in taking on the litigation so long as there are some documents backing up the essential theory.

If you were interviewing these Firms, per the terms of the Protective Order, could you share the results of the 2004 so far with them?

If not, could you involve each of the above in coming up with the classes of documents you plan to obtain in future 2004 exams?

Please let me know tomorrow so that I can take steps to ensure there are law firms pretty close to taking the Perkins Coie claims on sooner rather than later.

For example, if the above firms were not involved in your process, then I should probably file my 2004 exam to get the results of what Perkins Coie has shared with the Trustee so far.

Thanks
Ben

From: Benjamin Ellison
Sent: Thursday, August 20, 2020 12:09 PM
To: Mark Waldron <mark@mwaldronlaw.com>; Pamela M. Egan <pegan@potomacclaw.com>
Cc: Jason Edward Wax <wax.jason@gmail.com>
Subject: Glga Watt follow up

Mark

Thanks for the call this morning.

I understand that in response to the UST's motion to convert, the Chapter 11 Trustee is planning not to object, and not file its own Chapter 11 plan.

While I did not broach the topic on the call, the Committee is continuing to consider whether a plan (its own plan) may be preferable to conversion.

Given the issues that need to be resolved before conversion are considerable, please do not consent to the UST's motion ahead of the scheduled hearing.

Thanks

Ben

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